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March 12, 2012

**By ECF**

Hon. Carol Bagley Amon  
Chief United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Lopez, et al., v. City of New York, et al.  
11 CV 2607 (CBA) (RER)**

Dear Judge Amon:

We represent plaintiff Hector Lopez in the above action and write to respectfully request that the Court issue an order

- (i) scheduling a pre-motion conference concerning plaintiff Lopez's anticipated motion for legal fees and expenses pursuant to Fed. R. Civ. P. 54(d)(2)(B)(i) further to the Judgment filed February 29, 2012; and
- (ii) staying the current statutory due date of the motion from March 14 to a date to be determined.

On January 4, 2012, plaintiff accepted the defendants' Offer of Judgment. On February 29, 2012, the Clerk entered judgment in favor of plaintiff, permitting the recovery of his legal fees and expenses. Under FRCP (d)(2)(B)(i), Mr. Lopez's motion for such must be filed within 14 days of the entry of the judgment. Accordingly, we will have no choice but to file the motion within the next two days if the Court does not otherwise stay the deadline.

Thank you for your kind attention to this matter.

Respectfully submitted,

/s/

Michael Lumer

cc: Katherine A. Macfarlane, ACC (By ECF)